

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

Caleb Retelle,

Plaintiff,

v.

Tatyana Galmore,

CPS – Child Protective Services,

FCS – Family Court Services,

GAL – Alyssa Mahaffay,

Judge Rhonda Lanford,

Dane County Family Court,

City of Madison,

Does 1–10,

Defendants.

Case No.: (To be assigned upon removal)

25-cv-314-jdp

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS AND MOTION FOR INJUNCTIVE RELIEF

(Filed under 42 U.S.C. § 1983)

I. INTRODUCTION

This is a civil action brought pursuant to 42 U.S.C. § 1983 for violations of Plaintiff's federal constitutional rights under the First, Fifth, Sixth, Eighth, and Fourteenth Amendments, the Americans with Disabilities Act (ADA Title II), and related statutory and common law protections. Plaintiff Caleb Retelle, a natural father and private estate holder, alleges repeated abuse, civil rights violations, disability discrimination, endangerment of his child, and judicial misconduct by

the named state actors in connection with two related state proceedings: a family court custody dispute and a felony criminal case involving interference with custody.

II. JURISDICTION AND VENUE

1. This Court has jurisdiction under 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1343 (civil rights), and 42 U.S.C. § 1983.
 2. Venue is proper in the Western District of Wisconsin under 28 U.S.C. § 1391 because a substantial part of the events and omissions occurred within this District.
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III. PARTIES

3. Plaintiff: Caleb Retelle, a natural man and lawful father, resides in Madison, Wisconsin.
 4. Defendant: Tatyana Galmore, opposing party in a custody dispute and central to related endangerment events.
 5. Defendants: CPS, FCS, and GAL Alyssa Mahaffay acted under color of state law and violated Plaintiff's protected rights through discrimination, inaction, and misrepresentation.
 6. Defendant: Judge Rhonda Lanford acted in both her official and individual capacity under color of law in overseeing the family court proceedings.
 7. Defendants Does 1–10 are unknown agents and public officers complicit in the violations described herein.
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IV. FACTUAL ALLEGATIONS

8. Plaintiff submitted over 200 pieces of lawful evidence and filings since 2023 in the family court matter, all ignored or suppressed.
9. 17 contempts by the opposing party were ignored by the court and GAL, with no penalties issued.

10. Plaintiff was advised by CPS to retain custody of his daughter due to credible safety concerns and did so lawfully and in good faith.
 11. The child's mother allowed Vincent Morales, a restrained individual, into the home while the child was present—verified in police reports and testimony.
 12. After acting to protect his daughter, Plaintiff was arrested and charged with interference with custody (24CF1694) despite prior CPS instruction.
 13. During his arrest, Plaintiff's 8-month pregnant partner was assaulted by officers, resulting in the forced removal of her PICC line and medical endangerment.
 14. Plaintiff was:
 - Denied ADA accommodations in court and while incarcerated
 - Denied asthma medication during detainment, resulting in medical harm
 - Denied access to key witnesses while the opposing party cross-examined his own partner
 - Subjected to biased courtroom behavior, including judicial leading of opposing questions and suppression of evidence
 15. Plaintiff was retaliated against after filing lawful UCC documentation and status correction, and for invoking constitutional protections on record.
 16. The child suffered dental neglect under the mother's care, resulting in surgery for one-fourth of her teeth, while the court still enforced custody against Plaintiff.
 17. Plaintiff was subjected to shared bond manipulation between custody and criminal cases as a coercive mechanism to silence and control him.
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V. CLAIMS FOR RELIEF

Count I – Violation of First Amendment (Retaliation & Free Speech Suppression)

Defendants retaliated against Plaintiff for asserting protected speech, lawful filings, and status correction.

Count II – Violation of Fifth and Fourteenth Amendments (Due Process & Equal Protection)

Denial of fair hearing, biased enforcement, and violation of fundamental parental rights.

Count III – Violation of Sixth Amendment (Right to Counsel & Confront Witnesses)

Plaintiff was denied access to legal counsel and the ability to cross-examine material witnesses.

Count IV – Violation of Eighth Amendment (Cruel and Unusual Punishment)

Denial of asthma medication, mental health care, and sanitation while incarcerated.

Count V – Violation of ADA Title II (Failure to Accommodate Disability)

Defendants failed to provide documented disability accommodations in both court and custody proceedings.

Count VI – Civil Conspiracy and Abuse of Process (42 U.S.C. § 1983)


Defendants acted jointly to retaliate, suppress evidence, and enforce fraudulent or coercive legal actions.

VI. PRAYER FOR RELIEF

Plaintiff respectfully requests:

1. A declaratory judgment that his constitutional and statutory rights were violated.
2. An injunction halting all family court and related criminal proceedings pending federal review.
3. Full restoration of parental rights and custody.
4. Compensatory and punitive damages to be determined at trial.
5. An investigation into CPS, FCS, GAL, and judicial conduct.
6. Attorneys' fees and court costs as permitted by law.
7. Any other relief deemed just and proper by this Court.

Respectfully submitted,


Caleb Retelle

Natural Father / Pro Se Litigant

Date: April 14, 2025

Location: Madison, Wisconsin